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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 A.H., et al.,

17 Plaintiffs,

18 v.

19 COUNTY OF SAN BERNARDINO, et  
al.,

20 Defendants.  
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Case Number: 5:23-cv-01028-JGB-SHK

Assigned to:  
*Hon. Jesus G. Bernal*  
*Hon. Kenly Kiya Kato*

**NOTICE OF CONDITIONAL  
SETTLEMENT AND JOINT  
REQUEST TO VACATE ALL  
DATES**

**TO THIS HONORABLE COURT:**

Plaintiffs A.H., et al., and Defendants County of San Bernardino, et al. hereby submit the following notice of conditional settlement and joint request to vacate all dates pending approval of the settlement by the relevant County of San Bernardino boards.

1. On September 9, 2024, the parties participated in a mediation with the agreed-upon panel mediator, Richard Copeland. Following the mediation, the Parties reached a conditional settlement that resolves this case in its entirety.
2. The proposed settlement is conditioned upon approval by the relevant County of San Bernardino boards, including the Claims Board and Board of Supervisors, which is anticipated to take up to 60 days.
3. Once the proposed settlement has been approved, the parties will promptly file a notice of settlement and, within seven business days of Plaintiffs' receipt of the settlement funds, a request for dismissal of this action with prejudice.
4. Based on the foregoing, the Parties, by and through their counsel of record, respectfully request that the Court vacate all pending dates and deadlines, including the September 23, 2024, hearing on Defendants' motion for summary judgment, to allow for the proposed settlement to be approved and prevent the parties from incurring further costs and attorneys' fees in this matter.
5. In the event that the proposed settlement is not approved, then the Parties shall file a joint request for the pretrial and trial dates to be reset, including a new date for Defendants' motion for summary judgment to be heard. The Parties agree that if the proposed settlement is not approved and the hearing on the motion for summary judgment is reset, then the hearing on

1 the motion for summary judgment shall be based on the briefing currently  
2 on file (Dkt. Nos. 35, 37, 39).

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4 Respectfully submitted.

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6 DATED: September 17, 2024

**MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP**

7  
8 By: /s/ Kayleigh A. Andersen  
9 Eugene P. Ramirez, Esq.  
10 Kayleigh A. Andersen, Esq.  
11 Attorneys for Defendants

12 DATED: September 17, 2024

**LAW OFFICES OF DALE K. GALIPO**

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14 By: s/ Renee V. Masongsong  
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